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19 *Attorneys for Defendants SOC, LLC, and SOC Nevada, LLC*

20 **UNITED STATES DISTRICT COURT**  
21 **DISTRICT OF NEVADA**

22 DARLENE POST, individually and in her capacity  
23 as Special Administrator of the ESTATE OF  
24 DAVID POST; and KIPALEE PRINCE,  
25 individually and in her capacity as Special  
26 Administrator of the ESTATE OF DAVID  
27 PRINCE,

28 Plaintiffs,

vs.

SOC LLC, a foreign limited liability company; SOC  
NEVADA LLC, a foreign limited liability  
company; SOC DOE GUARD, an individual; and  
DOES 1-5 and ROE ENTITIES 1-5,

Defendants.

Case No. 2:25-cv-00062-NJK

**ORDER FOR EXTENSION FOR  
DEFENDANTS SOC LLC AND SOC  
NEVADA LLC TO RESPOND TO  
COMPLAINT**

**(SECOND REQUEST)**

Pursuan to Fed. R. Civ. P. 6 and this Court's Local Rules ("LR") of Practice LR IA 6-1 and LR 7-1, defendants, SOC LLC and SOC Nevada LLC (jointly, "SOC" or "Defendants"), submit this Motion for Extension for Defendants to Respond to Complaint (Second Request) (the "Motion"), to extend the deadline for SOC to respond to the Complaint [ECF No. 1-1], initially removed from the

1 Eighth Judicial District Court of the State of Nevada, Clark County, Nevada (the “State Court”), to  
2 this Court by 14 days to **May 2, 2025**. In support of this Motion, Defendants state:

3 1. Plaintiffs Darlene Post, Estate of David Post, Kipalee Prince, and Estate of David  
4 Prince (collectively, “Plaintiffs”) filed the Complaint in State Court on December 2, 2024.

5 2. Plaintiffs served the Complaint on Defendants on December 11, 2024.

6 3. Defendants removed the Complaint to this Court on January 10, 2025. *See* [ECF No. 1].

7 4. Under FRCP 81(c), the deadline for SOC to respond to the Complaint was January 17,  
8 2025.

9 5. On January 17, 2025, SOC filed its Motion for Extension for SOC to Respond to  
10 Complaint (First Request) (the “First Motion for Extension”) [ECF No. 11], requesting an extension  
11 to April 18, 2025, to respond to the Complaint.

12 6. In the First Motion for Extension, SOC represented that it needed to coordinate the  
13 terms of a protective order with Plaintiffs’ counsel to facilitate SOC obtaining the U.S. Department of  
14 Energy’s (“DOE”) approval to disclose confidential information subject to discovery in this Action.  
15 *See* First Mot. for Extension, (ECF No. 11, at ¶¶ 8–9, “The entry of a protective order likely will  
16 facilitate the Defendants obtaining the DOE’s approval to disclose confidential information subject to  
17 discovery in this litigation.”).

18 7. On April 3, 2025, the Parties filed the Stipulated Protective Order [ECF No. 20], which  
19 this Court denied on April 4, 2025 [ECF No. 21].

20 8. On April 9, 2025, SOC filed its Motion for Protective Order (the “Protective Order”)  
21 [ECF No. 22] to address the Court’s concerns with the Stipulated Protective Order, and the Protective  
22 Order is still pending before the Court.

23 9. On April 16, 2025, the DOE authorized SOC to disclose certain documents relevant to  
24 SOC’s forthcoming motion to dismiss as long as the motion to dismiss is filed under seal and the  
25 documents are subject to a protective order entered by the Court. As of the filing of this Motion, the  
26 Court has not ruled on the Protective Order.

27 10. Given that the Protective Order is still pending, SOC needs additional time to respond  
28 to the Complaint to fulfill the disclosure requirements set forth by the DOE.




11. On April 17, 2025, counsel for SOC, Sean Camacho, Esq., emailed Plaintiffs counsel, Dale Hayes, Esq., advising of SOC's intent to file this Second Request. Mr. Hayes responded by email to Mr. Camacho advising that Plaintiffs did not oppose the Second Request.

12. In compliance with LR IA 6-1 this is the second request for an extension of time to respond to the Complaint. There are no pending deadlines, and the requested extension will not prejudice any party.

Based on the foregoing, Defendants respectfully request that this Court enter an orde granting this Motion directing that Defendants have an additional 14-day extension to May 2, 2025, to respond to the Complaint.

Respectfully submitted this 17th day of April, 2025.



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IT IS SO ORDERED.  
Dated: April 18, 2025



Nancy J. Koppe  
United States Magistrate Judge

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